

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON**

**NARINDER S. SAMRA, and  
HARMINDER K. SAMRA,**

Plaintiffs,

vs.

**KARNAIL S. JOHAL and  
NILAKUMARI JOHAL; GRIGORY  
YELKIN and TATYANA YELKIN;  
STEWART TITLE; and DOES 1  
THROUGH 20,**

Defendants.

No. 2:09-cv-00176-RSL

DECLARATION OF NARINDER S.  
SAMRA IN SUPPORT OF BRIEF IN  
OPPOSITION TO DEFENDANTS  
JOHALS AND YELKINS' MOTION  
FOR SUMMARY JUDGMENT OF  
DISMISSAL

NOTED FOR: FRIDAY, JULY 30,  
2010

Narinder S. Samra declares and states:

1. I am a plaintiff in the above-entitled lawsuit. I have personal knowledge of the facts set forth herein and I am competent to testify to the same.
2. When the real property at issue in this lawsuit was sold to Four Seasons Roof and Remodel, Inc. in October 2003, Karnail Johal told me that each of the married couples who were Members of Land to Home, LLC (i.e., the Samras, the Johals, and the Yelkins) would receive a townhome as part of the sale. Karnail Johal also told me that Mrs. Samra and I would receive \$55,000.00 from

No. 2:09-cv-00176-RSL

Declaration of Narinder S. Samra in Support of Brief in  
Opposition to Johals and Yelkins' Motion for Summary  
Judgment - 1

ROBERT M. ZOFFEL, ESQ.  
2033 SIXTH AVENUE, SUITE 903  
SEATTLE, WASHINGTON 98121  
(206) 267-0377/FAX (206) 448-6579

1 this sale. As far as I know, none of the couples received a townhome. Mrs. Samra and I did not  
2 receive \$55,000.00 either. I am unaware of any distribution of Land to Home, LLC's assets prior to  
3 the final division of proceeds from the 2006 sale of the property.  
4

5 3. I have knowledge of the contents of the copies of handwritten documents which were  
6 admitted as Exhibit 5 to my deposition of April 14, 2010 and as Exhibit 1 to Mrs. Samra's  
7 deposition on the same date. I did not copy the signatures onto the original of either document, and I  
8 did not authorize any other person to do so. I do not possess, control, or know the whereabouts of  
9 the original of either document. Although I recognize my signature on both documents, I do not  
10 remember which of the two I actually signed.  
11  
12

13  
14 I declare under penalty of perjury under the laws of the State of Washington and the United  
15 States that the foregoing is true and correct.  
16

17  
18 Dated this 26th day of July, 2010 at \_\_\_\_\_.  
19 (city, state, country)  
20

21 \_\_\_\_\_  
22 Narinder S. Samra  
23  
24  
25  
26  
27  
28

FROM : SAMRA

FAX NO. : 9169297741

Jul. 26 2010 05:32PM P2

1 this sale. As far as I know, none of the couples received a townhome. Mrs. Samra and I did not  
2 receive \$55,000.00 either. I am unaware of any distribution of Land to Home, LLC's assets prior to  
3 the final division of proceeds from the 2006 sale of the property.  
4

5 3. I have knowledge of the contents of the copies of handwritten documents which were  
6 admitted as Exhibit 5 to my deposition of April 14, 2010 and as exhibit 1 to Mrs. Samra's  
7 deposition on the same date. I did not copy the signatures onto the original of either document, and I  
8 did not authorize any other person to do so. I do not possess, control, or know the whereabouts of  
9 the original of either document. Although I recognize my signature on both documents, I do not  
10 remember which of the two I actually signed.  
11  
12

13  
14 I declare under penalty of perjury under the laws of the State of Washington and the United  
15 States that the foregoing is true and correct.  
16

17  
18 Dated this 26th day of July, 2010 at Sacramento CA, U.S.A  
19 (city, state, country)

20  
21 Narinder S. Samra  
22 Narinder S. Samra  
23  
24  
25  
26  
27  
28

No. 2:09-cv-00176-RSL

Declaration of Narinder S. Samra in Support of Brief in  
Opposition to Johals and Yelkins' Motion for Summary  
Judgment - 2

ROBERT M. ZOFFEL, ESQ.  
2033 SIXTH AVENUE, SUITE 903  
SEATTLE, WASHINGTON 98121  
(206) 267-0377/FAX (206) 448-6579

**CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2010 I served the foregoing document upon:

Philip E. Cutler  
1191 Second Avenue, Suite 1650  
Seattle, WA 98101  
E-mail: philcutler@cnhlaw.com  
*Counsel for Defendants Karnail S. Johal,  
Nilakumari Johal, Grigory Yelkin,  
and Tatyana Yelkin*

Robert W. Sargeant  
Williams Kastner & Gibbs, PLLC  
601 Union Street, Ste. 4100  
E-mail: rsargeant@williamskastner.com  
*Counsel for Defendant Stewart Title*

Robert G. Nylander  
1191 Second Avenue, Suite 1650  
Seattle, WA 98101  
E-mail: rgnylander@cnhlaw.com  
*Counsel for Defendants Karnail S. Johal,  
Nilakumari Johal, Grigory Yelkin,  
and Tatyana Yelkin*

Larry E. Leggett  
Williams Kastner & Gibbs PLLC  
601 Union Street, Ste. 4100  
Seattle, WA 98101-1368  
E-mail: lleggett@williamskastner.com  
*Counsel for Defendant Stewart Title*

Thomas W. Hayton  
1191 Second Avenue, Suite 1650  
Seattle, WA 98101  
E-mail: tomhayton@cnhlaw.com  
*Counsel for Defendants Karnail S. Johal,  
Nilakumari Johal, Grigory Yelkin,  
and Tatyana Yelkin*

by electronic means through the Court's CM/ECF system.

DATED this 26th day of July, 2010.

s/ Robert M. Zoffel  
Robert M. Zoffel